

REMARKS**Status of Claims**

The Office Action mailed June 29, 2005 has been reviewed and the comments of the Patent and Trademark Office have been considered. Claims 1-24 were pending in the application. Claims 1, 19, 20, and 24 have been amended and no claims have been cancelled or newly added. Therefore, claims 1-24 are pending in the application and are submitted for reconsideration.

This amendment changes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, are presented, with an appropriate defined status identifier.

Prior Art Rejections

In the Office Action, claims 1-12, 15-18, 20, 21, 23, and 24 are rejected under 35 U.S.C. § 103(a) as being unpatentable over the Mehra et al. article "Designing a flexible services-based architecture for Internet Applications" (hereafter "Mehra") in view of U.S. patent no. 6,732,175 to Abjanic (hereafter "Abjanic"). Claims 13, 14, 19, and 22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Mehra and Abjanic further in view of U.S. patent no. 6,434,555 to Frolund et al. (hereafter "Frolund"). Applicants respectfully traverse these rejections for at least the following reasons.

Each of the independent claims 1, 19, 20, and 24 recite an apparatus, method, or software for interfacing between front-end data processing systems and back-end data processing systems wherein the interface comprises several layers with specifically recited features that best isolate changes between the several layers. In particular, each of the independent claims recite that the engine (that receives the message from the front end system) (1)*interprets* the received message and *uses a process map* to select among a plurality of nodes (that contain business logic) where (2) the process map is automatically created (or updated) by the engine based on the node business logic capabilities exposed by each node. See, for example, page 7-8 of the specification which disclose how the process maps are dynamically built based on node classes which expose their capabilities in terms of business tasks to be completed or messages to be handled. The engine interprets a received messages

and uses the up-to-date dynamically (or automatically built) process map to determine which nodes to create to handle the received message so that the received message does not need to contain an operation identifier of the transaction to be performed. These recited features are not disclosed or suggested by the applied prior art.

As acknowledged in the office action, Mehra does not disclose an application architecture in which the engine that processes the messages from the external system does not include any business logic. To cure this deficiency the office action relies on the newly applied Abjanic reference. However, the Abjanic reference also does not disclose or suggest that the process map is automatically created based on the node business logic capabilities exposed by each node. Rather, Abjanic discloses that its content director 145 compares application data from the request received from the front end application to a pattern or queries to determine if there is a match. However, these patterns or queries (and its mapping to nodes) are not automatically updated based on the business logic capabilities exposed by each node. Rather, Abjanic discloses that the patterns or queries may be updated by a user, a program, or an application but nowhere does it teach or suggest that it is automatically updated based on the business logic capabilities exposed by each node. Since this recited feature is missing from each of the applied prior art references, the office action fails to make a *prima facie* case of obviousness as required by section 103

It should be noted that, at best, the applied prior art is completely silent on the claimed feature of the process maps being automatically created based on the exposed business logic capabilities of the nodes. The PTO's review court has made it very clear that silence in a reference is hardly a substitute for clear and concrete evidence from which a conclusion of obviousness might justifiably flow. See, e.g., *Application of Burt*, 356 F.2d 115, 121 (CCPA 1966)

Furthermore, these recited features provide the benefit that the external application does not need to know details of the various nodes and their capabilities. Furthermore, the claimed engine dynamically maintains the process map according to the exposed node business logic capabilities such that the process map automatically accounts for all nodes as they are created. Therefore, neither the specific recited features nor its advantages are

disclosed or suggested by the applied prior art. Accordingly, the pending independent claims are patentable over the applied prior art.

The dependent claims are also in condition for allowance for at least the same reasons, as discussed above, as the independent claims on which they ultimately depend. In addition, they recite additional patentable features when considered as a whole.

Conclusion

In view of the foregoing amendments and remarks, applicants respectfully request entry and consideration of the instant amendment and reply because it is believed to place the application in condition for allowance. If there are any questions regarding the application, or if an examiner's amendment would facilitate the allowance of one or more of the claims, the examiner is invited to contact the undersigned attorney at the local telephone number below.

Should additional fees be necessary in connection with the filing of this paper, or if a petition for extension of time is required for timely acceptance of same, the Commissioner is hereby authorized to charge deposit account No. 19-0741 for any such fees; and applicants hereby petition for any needed extension of time.

Respectfully submitted,

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